

SHER TREMONTE LLP

September 11, 2024

**BY ECF**

The Honorable Leo M. Gordon  
United States Court of International Trade  
One Federal Plaza  
New York, NY 10278

**Re: *Gardner v. Combs et al.*, Docket No. 24-cv-07729**

Dear Judge Gordon:

We represent Defendant Sean Combs (“Mr. Combs”) in the above-referenced action. In accordance with Your Honor’s direction during the Status Conference held on September 10, 2024 (the “Conference”), counsel for Combs submits the attached proposed order, for the Court’s review, setting forth the filing and briefing schedule agreed to at the Conference by counsel for Mr. Combs, Defendant UMG Recordings, Inc. (incorrectly sued herein as Defendants Uptown Records, MCA Inc., and Universal Music Group), and Plaintiff Liza Gardner.

We thank the Court for its consideration.

Respectfully,

/s/ Yonatan Y. Jacobs  
Yonatan Y. Jacobs (NJ Bar No.: 022512010)  
Erica A. Wolff (appearing *pro hac vice*)  
Michael Tremonte (appearing *pro hac vice*)

Enclosure/Attachment

cc: All counsel of Record via ECF